

THE HONORABLE TIFFANY M. CARTWRIGHT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

DAKOTA ROBERTS and DAWN MARIE
HACKER, individually and on behalf of all
persons similarly situated,

Plaintiffs,

v.

SIDWELL AIR FREIGHT, INC, and DHL EXPRESS
(USA) INC., d/b/a DHL EXPRESS,

Defendants.

NO. 3:21-cv-05912-TMC

**STIPULATED MOTION AND ORDER
EXTENDING CLASS CERTIFICATION
BRIEFING SCHEDULE**

NOTED FOR CONSIDERATION:
JANUARY 24, 2024

I. STIPULATION

1. This is a collective and proposed action wage and hour lawsuit filed by Plaintiffs Dakota Roberts and Dawn Marie Hacker against Defendants Sidwell Air Freight, Inc. and DHL Express USA Inc., d/b/a DHL Express.

2. The Court granted Plaintiffs' motion for conditional certification of a collective action under the FLSA, notice was sent to the collective, and 47 individuals opted in.

3. The parties initially proposed that Plaintiffs file their motion for class certification of their state law claims under Federal Rule of Civil Procedure 23 on November 3, 2023. ECF No. 63 ¶ 5(F).

4. On October 17, 2023, the parties submitted a Stipulated Motion and Proposed Order Setting Class Certification Briefing Schedule in which the parties requested the Court enter

1 a class certification briefing schedule that would allow additional time for the parties to engage
2 in settlement negotiations and to complete discovery. ECF No. 67.

3 5. On October 20, 2023, the Court entered its Order on Stipulated Motion and
4 Proposed Order Setting Class Certification Briefing Schedule and Amended Case Schedule, which
5 set an April 12, 2024 deadline for Plaintiffs to file their motion for class certification. ECF No. 68.

6 6. The parties have agreed to a date for mediation, February 27, 2024, and a
7 mediator, Dennis A. Clifford, Esq.

8 7. To allow time for the parties to focus on their mediation efforts, and to give the
9 parties time to conduct full discovery should the mediation be unsuccessful, the parties
10 respectfully request an extension of time for Plaintiffs to file their motion for class certification,
11 as follows:

12 Plaintiffs file their motion for class certification: August 30, 2024

13 Defendants file their class certification response: September 20, 2024

14 Plaintiffs file their class certification reply: September 27, 2024

15 8. The proposed revised schedule aligns the class certification and decertification
16 briefing schedules, and will not affect any other deadline, including the date for the close of
17 discovery, or the March 3, 2025 trial date.

18 STIPULATED TO AND DATED this 24th day of January, 2024.

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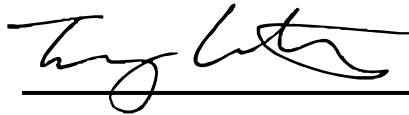
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II. ORDER

IT IS SO ORDERED.

DATED this 24th day of January, 2024.

A handwritten signature in black ink, appearing to read "Tiffany M. Cartwright", is written over a solid black horizontal line.

Tiffany M. Cartwright
United States District Judge